## Action

*Educator Preparation Committee*

## Initial Institutional Approval: Review of Criteria and Process

**Executive Summary:** This agenda item provides a review of the Initial Institutional Approval process adopted in February 2016. The item also identifies some Factors to Consider for the Commission to consider as decisions are made about an institution's Eligibility to offer an educator preparation program in California.

**Policy Question**: How can the Commission best apply adopted eligibility criteria to their evaluation of institutions seeking to offer an educator preparation program in California?

**Recommended Action:** That the Commission discuss the Initial Institutional Approval process and provide direction to staff.

**Presenters:** Cheryl Hickey, Administrator and Teri Clark, Director, Professional Services Division

**Strategic Plan Goal**

***II. Program Quality and Accountability***
   a) Develop and maintain rigorous, meaningful, and relevant standards that drive program quality and effectiveness for the preparation of the education workforce and are responsive to the needs of California's diverse student population.

December 2016

# Initial Institutional Approval: Review of Criteria and Process

**Introduction**

This agenda item presents a review of the criteria and process for Initial Institutional Approval adopted at the February 2016 Commission meeting. The Commission had placed a moratorium on Initial Institutional Approval (IIA) in October 2015 while it was developing a revised IIA process. The Commission lifted the moratorium when it adopted the revised *Accreditation Framework* in February 2016. Two prospective sponsors have been on the Commission's agenda since the moratorium was lifted. One prospective sponsor was granted Initial Eligibility and is now in Part III of the IIA process, while the other prospective sponsor was denied eligibility. At the October 2016 Commission meeting, members of the Commission expressed a desire to revisit the process.

**Background**

Education Code section 44372(c) sets forth the Commission's responsibility to rule on the eligibility of an applicant for initial accreditation when the applying institution is not approved to prepare educators for state certification in California. The Committee on Accreditation (Committee) is charged with making decisions about the initial accreditation of new programs of educator preparation through Education Code §44373(b)(2).

Although the Committee is the responsible entity for approving new educator preparation programs, the Commission adopts the *Accreditation Framework* which sets the accreditation policies in place, adopts all standards that institutions and programs are required to meet, and interviews and selects the members of the Committee.

**Initial Institutional Approval Process**

At a high level, the IIA process consists of the following:

        Part I:   Prerequisites
        Part II:  Eligibility
        Part III: Standards and Preconditions
        Part IV: Provisional Approval
        Part V:  Full Approval

*Part I: Prerequisites*

Prior to submitting to the criteria for eligibility, institutions must meet two prerequisites. The first prerequisite is in statute and requires that the institution hold Regional Accreditation (IHE) or have governing board approval (LEA). If the entity seeking initial approval is neither an IHE nor an LEA, the institution is limited to teacher preparation in STEM fields and must also meet other requirements. The second prerequisite is the requirement that all institutions seeking initial approval participate in *Accreditation 101: Expectations and Responsibilities of Commission Approved Institutions* with a team which includes key staff from the institution as well as at least one partner.

Institutions either meet the prerequisites or they do not. Once both prerequisites have been met, staff informs the institution that they may move to Part II: Eligibility.

*Part II: Eligibility:*
Once an entity has met the prerequisites it is invited to present material that addresses the Commission's eligibility criteria. The Commission has adopted twelve criteria for determining whether an entity is eligible to move forward to Part III and respond to the Common and Program Standards and Preconditions. The institution submits a response with evidence as appropriate that it meets each Eligibility criterion. Commission staff also research the entity through search engines such as Google and Nexus. Both the submission from the institution and the product of staff research is provided to the Commission for their review and determination of an institution's eligibility to move forward in the initial approval process.

The following 12 criteria (described more fully in Appendix A) for eligibility have been adopted by the Commission:
    1. Responsibility and Authority
    2. Mission and Vision
    3. Lawful Practices
    4. Commission Assurances and Compliance
    5. Requests for Data
    6. Veracity in Claims and Documentation
    7. Grievance Process
    8. Communication and Information
    9. Student Record Management, Access and Security
    10. History of Prior Experience and Effectiveness in Offering Educator Preparation Programs
    11. Capacity and Resources
    12. Disclosure

To date in the implementation of the new IIA process, staff has not made recommendations as to whether or not the institution meets each of the twelve criteria, allowing the Commission to have maximum flexibility to determine the outcome. Commission members raised questions about that process in the most recent Commission meeting. Staff offers recommendations below to fine tune the process and support the Commission review of proposals for IIA.

*Possible Reordering of the Twelve Criteria*
Of the twelve criteria for Eligibility adopted by the Commission, nine of the criteria appear to be fairly simple and the Commission could allow staff to review and make a recommendation as to whether the entity is in compliance with the nine criteria. However, three of the criteria are more complex and require a more thorough analysis and based on the analysis, reasonable people could review the same information and come to varying conclusions. For the more complex criteria the Commission would need to weigh the evidence and determine, collectively, if the criteria have been met.

The twelve criteria and staff's assessment of which criteria fall into these two categories are listed below:

| Staff Reviews and Recommends | Commission Discusses and Decides |
|---|---|
| 1. Responsibility and Authority | 6. Veracity in Claims and Documentation |
| 2. Mission and Vision | 10. History of Prior Experience and Effectiveness in Offering Educator Preparation Programs |
| 3. Lawful Practices | |
| 4. Commission Assurances and Compliance | |
| 5. Requests for Data | 11. Capacity and Resources |
| 7. Grievance Process | |
| 8. Communication and Information | |
| 9. Student Record Management, Access and Security | |
| 12. Disclosure | |

Staff suggests that for the nine simpler criteria that staff identified, staff will review the documentation submitted by the prospective sponsor and recommend if the criteria have been met. The Commission could ask questions or request additional information about any of the criteria, but the staff would have reviewed all documentation and made a determination for the nine criteria before the entity is placed on the Commission's agenda. Staff recommends the criteria be renumbered with the nine simpler criteria first and the three more complex criteria renumbered ten, eleven, and twelve.

For the three criteria that are identified as complex, staff suggests that there are some factors the Commission could think about as it considers these criteria in making decisions about an institution's eligibility to move to Part III of the initial approval process. At the determination of eligibility stage in the process, it is not expected that documents would be submitted that would identify the specific program design, qualifications of faculty, specifics on fieldwork requirements or other program specifics. These program quality issues would be provided by the entity and reviewed against the Commission's standards by members of the Board of Institutional Review should the Commission grant eligibility and the entity moves forward to Part III of the IIA process.

### *Veracity*
Staff does not suggest any particular Factors to Consider under this criterion, but considering the importance of veracity to every other aspect of any proposal to offer educator preparation programs in California, staff suggests that any evidence that arises on this matter be considered at the discretion of the Commission.

### *History of Prior Experience and Effectiveness in Offering Educator Preparation Programs*
As the Commission considers a prospective sponsor's history of effectiveness in offering educator preparation programs, staff suggests that the following are possible Factors to Consider when reviewing a prospective sponsor's submission:
- Evidence that the entity is operating in good standing in other jurisdictions where it has sponsored educator preparation or other related work

- Evidence that there is a commitment to California's adopted state standards and frameworks
- Evidence that there is a commitment to the health and success of all students
- Evidence that there is a commitment to a program design that includes attention to both the theoretical foundations of teaching and learning and effective professional practice
- Evidence on completion rates, placement rates, and retention rates of program completers in other jurisdictions

### *Capacity and Resources*
- Evidence that there are sufficient resources to operate effective educator preparation programs in the first 2-3 years of the program
- Evidence that the leadership, instructional personnel and support staff are capable of maintaining and delivering an effective educator preparation program
- Evidence that the institution is able to sustain the requirements of accreditation activities in California including data collection and analysis leading to ongoing program improvement.

Staff asks that the Commission discuss these Factors to Consider and amend or add to the prompts as it deems necessary and appropriate. Staff recommends that any specific criterion that is not found by the Commission to be fully met be identified during the public meeting when a proposal for IIA is being considered, in the event that the Commission needs more information or in cases where the Commission decides to deny a request for Eligibility.

Staff suggests that if concerns are raised about a prospective sponsor during the public comment portion of a Commission meeting that the entity should be afforded the opportunity to respond to the concerns in writing. The response would be provided in the agenda for a future Commission meeting. Institutions determined by the Commission to be eligible are able to move to Part III of the initial approval process, however they are not yet Approved Program Sponsors.

### Part III – Alignment with All Applicable Standards and Preconditions
In this stage of the IIA process, the prospective sponsor must demonstrate that it meets the Commission's adopted standards (Common and Program) as well as the Preconditions for the types of educator preparation programs that the entity plans to sponsor. Members of the Board of Institutional Review (BIR) are tasked with reviewing the documents and evidence submitted by the program sponsor to determine if standards and preconditions are met. BIR members review the Common Standards (Provided in Appendix B) submission and each program proposal. This part of the review process often takes multiple submissions where the readers ask questions and the institution provides additional information. Once an institution is found by the BIR to be aligned to the Common Standards and has met the preconditions, as determined by staff, the Commission will determine whether to grant provisional approval to the institution.

If the Commission grants provisional approval to the institution, the Committee on Accreditation will consider approval of the proposed programs based on program standards. The proposed

programs are not placed before the Committee until the readers have found the program to meet all of the Commission's standards and the Commission has granted provisional approval.

**Part IV – Provisional Approval**
Provisional Approval is granted by the Commission for 2-3 years. During this time, the sponsor offers the program(s) and collects data on program effectiveness. After at least one cohort has completed the program, the sponsor hosts an accreditation site visit. The findings from this site visit, as well as other data collected during the Provisional Approval period are presented to the Commission. At that time, the Commission may grant full approval or deny approval. If denied, the institution would cease to offer educator preparation programs in California. Staff would work with the institution to ensure that current candidates were taught out or moved to other programs.

**Part V – Full Approval**
If the sponsor earns full approval from the Commission, it is integrated into the regularly scheduled accreditation activities. The Committee will monitor the programs through annual data submission, Preconditions reviews in years 1 and 4, Program Review and Common Standards Review in year 5, and a site visit in year 6 of the accreditation cycle.

**Staff Recommendation**
1. Approve the renumbering of the twelve Eligibility Criteria and the designation of the first nine criteria as ministerial and the last 3 criteria as discretionary.
2. Provide guidance to staff regarding the Factors to Consider as described in this agenda item.
3. Institute a procedure that when a member of the Commission makes a motion related to Institutional Eligibility that either denies the request for Eligibility or asks for additional information, that the motion include the criterion or criteria that the Commission does not find to be met at the time of the motion, and specify the additional information that the program sponsor must provide to be considered for approval in the future.

# Appendix A

**PART II – Eligibility Requirements**

Eligibility Requirements will be brought before the Commission for consideration and a determination of approval or denial. A finding of approval will allow an institution to move forward to Part III of the Initial Institutional Process.

| Criterion 1 |
| --- |
| **Responsibility and Authority** |
| Institutions seeking Initial Institutional Approval must: |
|    a) Identify the position within the organizational structure that is responsible for ongoing oversight of all educator preparation programs offered by the entity including educator preparation programs offered by extension divisions. |
|    b) Identify the individual who will coordinate each educator preparation program sponsored by the entity. Provide a description of the reporting relationship between this person(s) and (a). If a reporting relationship is indirect, describe the levels of authority and responsibility for each educator preparation program. |
|    c) Provide an organizational chart for the institution as well as the division(s) within the institution responsible for the oversight of educator preparation programs; include any parent organization, outside organization(s), or partner(s) who will be involved in the oversight of the educator preparation unit and/or responsible for program delivery. |
|    d) Provide policies to ensure that duties regarding credential recommendations are not delegated to persons other than employees of the Commission approved institution. |
|    e) Provide assurance that individuals identified as responsible for credential recommendations will participate in Commission training related to the recommendation process. |
| **Criterion 2: Mission and Vision** |
| To be granted initial institutional accreditation, an institution must: |
| • provide its mission and vision related to educator preparation |
| • confirm that the mission and vision will be published on the website and in institutional documents provided to candidates |
| **Criterion 3: Lawful Practices** |
| To be granted initial institutional accreditation, a program of professional preparation must be proposed and operated by an entity that makes all personnel decisions without unlawful discrimination. The entity must provide written policy as verification that decisions regarding the admission, retention or graduation of students, and all personnel decisions regarding the employment, retention or promotion of employees are made without unlawful discrimination. |

## Criterion 4: Commission Assurances and Compliance

To be granted Initial Institutional Approval, the initial program proposal must include the following assurances:

a) That there will be compliance with all preconditions required for the initial program(s) the institution would like to propose (General and program specific preconditions for proposed programs must accompany this document)

b) Provide assurance that all required reports to the Commission including but not limited to data reports and accreditation documents, will be submitted by the Commission approved entity for all educator preparation programs offered including extension divisions.

c) That the sponsor will cooperate in an evaluation of the program by an external team or a monitoring of the program by a Commission staff member.

d) That the sponsor will participate fully in the Commission's accreditation system and adhere to submission timelines.

e) That once a candidate is accepted and enrolled in the educator preparation program, the sponsor must offer the approved program, meeting the adopted standards, until the candidate;

    i. Completes the program;

    ii. Withdraws from the program;

    iii. Is dropped from the program;

    iv. Is admitted to another approved program to complete the requirements, with minimal disruption, for the authorization in the event the program closes. In this event, an individual transition plan would need to be developed with each candidate.

## Criterion 5: Requests for Data

An institution seeking Initial Institutional Approval must identify a qualified officer responsible for reporting and responding to all requests from the Commission within the specified timeframes for data including, but not limited to:

a) program enrollments

b) program completers

c) examination results

d) state and federal reporting

e) candidate competence

f) organizational effectiveness data

g) other data as indicated by the Commission

## Criterion 6: Grievance Process

To be granted Initial Institution Approval, the sponsor must:

a) Provide a clearly delineated grievance process for candidates and applicants.

b) Demonstrate that information pertaining to the grievance process is accessible to all candidates and applicants.

c) Provide documentation that candidates have been informed of the grievance process and that the process has been followed.

## Criterion 7: Communication and Information

To be granted Initial Institution Approval, the sponsor must provide a plan for communicating and informing the public about the institution and the educator preparation programs. The plan must demonstrate that:

a) The institution will create and maintain a website that includes information about the institution and all approved educator preparation programs. The website must be easily accessible to the public and must not require login information (access codes/password) in order to obtain basic information about the institution's programs and requirements as listed in (b).

b) The institution will make public information about its mission, governance and administration, admission procedures, and information about all Commission approved educator preparation programs.

c) Information will be made available through various means of communication including but not limited to website, institutional catalog, and admission material.

## Criterion 8: Student Records Management, Access, and Security

To be granted Initial Institution Approval, the sponsor must demonstrate that it will maintain and retain student records. Institutions seeking Initial Institutional Approval will provide verification that:

a) Candidates will have access to and be provided with transcripts and/or other documents for the purpose of verifying academic units and program completion.

b) All candidate records will be maintained at the main institutional site or central location (paper or digital copies).

c) Records will be kept securely in locked cabinets or on a secure server located in a room not accessible by the public.

d) Candidates will be provided with transcript and/or other documents for the purpose of verifying academic units or program completion.

## Criterion 9: Disclosure

Institutions must disclose:

- Information regarding the proposed delivery model (online, in person, hybrid, etc.)
- All locations of the proposed educator preparation programs including satellite campuses.
- Any outside organizations (those individuals not formally employed by the institution seeking Initial Institutional Approval) that will be providing any direct educational services as all or part of the proposed programs.

## Criterion 10: Veracity in all Claims and Documentation Submitted

To be granted Initial Institution Approval, the institutional leadership (Dean or Superintendent) must positively affirm the veracity of all statements and documentation submitted to the Commission. Evidence of a lack of veracity is cause for denial of initial institutional accreditation.

**Criterion 11: History of Prior Experience and Effectiveness in Educator Preparation**

Institutions seeking Initial Institutional Approval must have sponsored an educator preparation program leading to licensure, or participated as a partner in any educator preparation programs and/or programs focused on K-12 public education and provide history related to that experience. CTC staff reserve the right to conduct Google/Nexus searches regarding the institution, governing board and administration. Institutions must submit:

a) History related to its prior experience preparing, training and supporting educators within California or in other states.

b) A list of all states and/or countries in which the institution is currently operating and the status of the institution's approval in each of those locations.

c) Retention and completion data in educator preparation programs or other programs when educator preparation data are not available.

Proof of third party notification enlisting comments to be sent to: Input@ctc.ca.gov.

**Criterion 12: Capacity and Resources**

To be granted Initial Institution Approval, an institution must submit a Capacity and Resources plan providing evidence about how it will sustain the educator preparation program(s) through a 2 – 3 year provisional approval (if granted) at a minimum. An institution's Capacity and Resource plan must include:

a) Copy of the most recent audited budget for the institution.

b) A proposed operational budget for the educational unit.

c) Information about instructional and support personnel for the educational unit.

d) Evidence of K-12 partnerships for the purposes of providing fieldwork.

e) Information about facilities and/or digital learning platforms.

f) A plan to teach out candidates if, for some reason, the institution is unable to continue providing educator preparation program(s).

# Appendix B: Common Standards

**Standard 1: Institutional Infrastructure to Support Educator Preparation**

Each Commission-approved *institution* has the infrastructure in place to operate effective educator preparation programs. Within this overall infrastructure:

- The *institution* and education *unit* create and articulate a *research-based vision* of teaching and learning that fosters coherence among, and is clearly represented in all educator preparation programs. This vision is consistent with preparing educators for *California public schools* and the effective implementation of California's adopted standards and curricular frameworks.

- The *institution* actively involves *faculty*, instructional personnel, and relevant *stakeholders* in the organization, coordination, and decision making for all educator preparation programs.

- The education *unit* ensures that *faculty* and instructional personnel regularly and systematically collaborate with colleagues in P-12 settings, college and university units and members of the *broader educational community* to improve educator preparation.

- The *institution* provides the *unit* with sufficient resources for the effective operation of each educator preparation program, including, but not limited to, coordination, admission, advisement, curriculum*, professional development*/instruction, *field based supervision* and *clinical experiences*.

- The *Unit Leadership* has the authority and institutional *support* required to address the needs of all educator preparation programs and considers the interests of each program within the *institution*.

- Recruitment and *faculty* development efforts suppor*t* hiring and retention of *faculty* who represent and support diversity and excellence.

- *The institution* employs, assigns and retains only *qualified persons* to teach *courses*, provide *professional development*, and *supervise* field-based and *clinical experiences*. Qualifications of *faculty* and other instructional personnel must include, but are not limited to: a) current knowledge of the content; b) knowledge of the current context of public schooling including the California adopted P-12 content standards, frameworks, and accountability systems; c) knowledge of diversity in society, including diverse abilities, culture, language, ethnicity, and gender orientation; and d) demonstration of effective professional practices in teaching and learning, *scholarship*, and *service.*

- The education *unit* monitors a credential recommendation process that ensures that candidates recommended for a credential have met all requirements.

**Standard 2: Candidate Recruitment and Support**
Candidates are recruited and *supported* in all educator preparation *programs* to ensure their success.

- The education *unit* accepts applicants for its educator preparation *programs* based on clear criteria that include *multiple measures* of candidate qualifications.

- The education *unit* purposefully recruits and admits candidates to diversify the educator pool in California and provides the *support*, advice, and assistance to promote their successful entry and retention in the profession.

- Appropriate information and personnel are clearly identified and accessible to guide each candidate's attainment of *program* requirements.

- Evidence regarding progress in meeting competency and performance expectations is consistently used to guide advisement and candidate *support* efforts. A clearly defined process is in place to identify and *support* candidates who need additional assistance to meet competencies.

**Standard 3: Course of Study, Fieldwork and Clinical Practice**
The *unit* designs and implements a planned sequence of coursework and *clinical experiences* for candidates to develop and demonstrate the knowledge and skills to educate and support *P-12 students* in meeting state-adopted content standards.

The *unit* and its programs offer a high-quality course of study focused on the knowledge and skills expected of beginning educators and grounded in *current research* on *effective practice*. Coursework is integrated closely with *field experiences* to provide candidates with a cohesive and comprehensive program that allows candidates to learn, practice, and *demonstrate competencies* required of the credential they seek.

The *unit* and all programs collaborate with their *partners* regarding the criteria and selection of *clinical personnel*, *site-based supervisors* and school sites, as appropriate to the *program.*

- Through site-based work and *clinical experiences*, programs offered by the *unit* provide candidates with opportunities to both experience issues of diversity that affect school climate and to effectively implement research-based strategies for improving teaching and *student* learning.

- *Site-based supervisors* must be *certified* and experienced in teaching the specified content or performing the services authorized by the credential.

- The process and criteria result in the selection of *site-based supervisors* who provide effective and knowledgeable *support* for candidates.

- *Site-based supervisors* are trained in supervision, oriented to the supervisory role, *evaluated* and recognized in a systematic manner.

- All *programs* effectively implement and *evaluate* fieldwork and clinical practice.

- For each *program* the *unit* offers, candidates have significant experience in school settings where the curriculum aligns with California's adopted content standards and frameworks,

and the school reflects the diversity of California's student and the opportunity to work with the range of *students* identified in the *program* standards.

**Standard 4 – Continuous Improvement**

The education *unit* develops and implements a comprehensive continuous improvement process at both the *unit* level and within each of its *programs* that identifies program and *unit* effectiveness and makes appropriate modifications based on findings.

- The education *unit* and its programs regularly assess their effectiveness in relation to the course of study offered, fieldwork and clinical practice, and *support* services for candidates.

- Both the <u>*unit*</u> and its *programs* regularly and systematically collect, analyze, and use candidate and *program completer* data as well as data reflecting the effectiveness of *unit* operations to improve *programs* and their *services*.

The continuous improvement process includes multiple sources of data including 1) the extent to which candidates are prepared to enter professional practice; and 2) feedback from *key stakeholders* such as employers and community *partners* about the quality of the preparation.

**Standard 5 – Program Impact**

The *institution* ensures that candidates preparing to serve as professional school personnel know and demonstrate knowledge and skills necessary to educate and support effectively all *students* in meeting state adopted academic standards. Assessments indicate that candidates meet the Commission adopted competency requirements as specified in the program standards.

The *unit* and its *programs* evaluate and demonstrate that they are having a *positive impact* on candidate learning and competence and on *teaching and learning* in schools that serve California's *students.*

*\*Italicized language represents language that will be included in a Common Standards Glossary.*